

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MISSOURI  
3 EASTERN DIVISION

4 AMIE LITTLEFIELD, )

)

)

5 PLAINTIFF, )

)

)

6 vs. ) Case No.

) 4:19-CV-304-SEP

7 )

8 AMERICAN )

)

9 ALTERNATIVE )

)

10 INSURANCE )

)

11 CORPORATION, )

)

12 DEFENDANT. )

)

13  
14 DEPOSITION OF RONALD BIRDSOING  
15 TAKEN ON BEHALF OF THE DEFENDANT  
16 JUNE 13, 2022

17 REPORTED BY STACY L. HEARST, CCR 923

18 SEE INDEX PAGE 2

1 Q And what is your position with  
2 St. Luke's hospital?

3 A Network director of security.

4 Q And could you provide a  
5 description of your job duties and, you know,  
6 what your day-to-day entails?

7 A Director of security basically at  
8 two different hospitals, St. Luke's in  
9 Chesterfield, St. Luke's in Des Peres, and I  
10 oversee all security matters.

11 Q And so, are you primarily based at  
12 the 232 South Woods Mill Road, Chesterfield  
13 location?

14 A Yes, I am.

15 Q And how many days per week are you  
16 there? Is that five days a week? How is  
17 your --

18 A Five days, yes.

19 Q Okay. I wasn't sure if your time  
20 was split between locations. Okay.

21 And how long have you been  
22 employed by St. Luke's Hospital?

23 A Twenty-four years.

24 Q Okay. So, you were employed at  
25 St. Luke's at the time this incident took

1 not saved in any system in possession of  
2 St. Luke's?

3 A I am sorry. What?

4 Q Prior versions of that policy  
5 wouldn't be saved on any system at St. Luke's?

6 A No.

7 Q Do you recall what policy  
8 regarding compliance with police  
9 investigations would have been in effect on  
10 November 24 of 2010?

11 A That would be the second document.  
12 Could you repeat the question?

13 Q So, it's my understanding based on  
14 what you just said that neither of those two  
15 policies were in effect on November 24th,  
16 2010. And you testified earlier that you were  
17 employed at St. Luke's as of the date of the  
18 incident.

19 Could you just, you know, to the  
20 best you can, explain what kind of process  
21 pertaining -- or protocol pertaining to  
22 compliance with police investigations was in  
23 effect as of 2010?

24 MR. CEJAS: Let me just object  
25 to foundation real quick. I don't think that

1 submitted a request to St. Luke's Hospital?

2 A No.

3 Q If you look to request number four  
4 here, it says, Any maps regarding video  
5 recording equipment pertaining to St. Luke's  
6 Hospital at 232 South Woods Mill Road,  
7 Chesterfield, Missouri 63017, as they were in  
8 place on or around November 24th, 2010.

9 Did you produce any documents  
10 pursuant to this request?

11 A Yes.

12 Q And just so I can mark it as an  
13 exhibit, which document are you referring to?

14 A All three.

15 Q Okay. So, all three of those  
16 documents were produced pursuant to request  
17 number four?

18 A Yes.

19 Q Can I just mark this as Exhibit 2?  
20 Sorry. Exhibit 3.

21 (Exhibit 3 was marked for  
22 identification.)

23 BY MR. KNUDSEN:

24 Q First of all, these videos look  
25 like they are dated May 19th, 2022.

1) Were these -- I guess I will start  
2 out by asking were these cameras in these  
3 present locations as identified or as shown in  
4 these pictures as of November 24th, 2010?

5 A Yes.

6 Q And they have not been changed in  
7 any way?

8 A No.

9 Q So, if you turn to request number  
10 five, it states, Any documents pertaining to  
11 Amie Standal, now Littlefield, an employee of  
12 Monarch Fire Protection District at St. Luke's  
13 Hospital at 232 South Woods Mill Road,  
14 Chesterfield, Missouri 63017 on November 24th  
15 to 25th of 2010. This includes any medical  
16 treatment of Amie Standal, now Littlefield,  
17 report of injury regarding Amie Standal  
18 Littlefield and treatment of a patient of Amie  
19 Standal Littlefield, identity has been  
20 previously exchanged among the parties.  
21 St. Luke's need not reproduce information  
22 previously produced pursuant to protective  
23 order in this matter.

24 So, did you produce any additional  
25 documents pursuant to request number five?

1 Q Yes.

2 A Right, to me. I am the final  
3 person to see them.

4 Q So, all reports made regarding  
5 similar incidents as the one which occurred on  
6 November 24th, 2010 eventually have come  
7 before you?

8 MR. CEJAS: Let me just object  
9 real quick. When you say similar incidents, I  
10 am not sure what you mean.

11 MR. KNUDSEN: Oh, sorry.

12 BY MR. KNUDSEN:

13 Q So, if somebody were claimed to  
14 have been injured on St. Luke's property and  
15 made a report about it, would that eventually,  
16 all such reports would have eventually come  
17 before you?

18 A Yes.

19 Q And no report regarding such a  
20 circumstance was ever filed regarding an  
21 incident on November 24th, 2010?

22 A I am sorry. Repeat the first  
23 part?

24 Q No such report of anybody being  
25 injured on St. Luke's Hospital was made on

1 November 24th or afterwards pertaining to --  
2 sorry, Amie Littlefield, then Standal?

3 A No report.

4 Q And you searched both for Standal,  
5 S-T-A-N-D-A-L, and Littlefield,  
6 L-I-T-T-L-E-F-I-E-L-D?

7 A Yes.

8 Q And Amie being A-M-I-E?

9 A Yes.

10 Q And you checked your records for  
11 such reports filed by Adam Coughlin, A-D-A-M  
12 C-O-U-G-H-L-I-N, as well?

13 A Yes.

14 Q That's all I have for you.

15 Have you understood all my  
16 questions today?

17 A Yes. Yes, sir.

18 MR. CEJAS: Brian, anything?

19 CROSS EXAMINATION

20 BY MR. WINEBRIGHT:

21 Q Mr. Birdsong, can you hear me?

22 A Yes, I can hear you.

23 Q My name is Brian Winebright. I  
24 represent the plaintiff in this matter, Amie  
25 Littlefield.

1 warning drivers about ambulance traffic?

2 A No.

3 Q As you enter the tunnel from the  
4 side with the blue arrow, I guess that's the  
5 Highway 141 side?

6 A Correct.

7 Q Are there different lanes of  
8 travel for public vehicles or ambulances?

9 A No.

10 Q If you enter the tunnel from the  
11 blue side, you would reach the ambulance  
12 entrance first, followed by the public  
13 entrance. Fair?

14 A Correct.

15 Q In 2010, if St. Luke's were to  
16 receive a request for security footage within  
17 the thirty- to sixty-day timeframe in which  
18 the footage still existed, what would -- how  
19 would St. Luke's respond to that request?

20 A Depends where it came from.

21 Q If it was similar to a case like  
22 this, if you received a deposition notice or a  
23 subpoena requesting that footage, what  
24 processes would be undergone to provide that  
25 footage to the requesting party?



1           A           It would be copied onto a disc.

2           Q           Let me -- I guess I am going to  
3           try to break it down more.

4                       So, you received the request,  
5           would that request go to you as the director  
6           of security?

7           A           It should.

8           Q           Would it come directly to you or  
9           how would it get in your hands back in 2010?

10          A           It could have come through our  
11          risk manager office, it could have come  
12          through CEO's office.

13          Q           Would it be up to you to decide  
14          whether or not responsive documents or video  
15          were produced or was that someone else's  
16          responsibility in 2010?

17          A           I didn't quite understand what you  
18          said.   Excuse me.

19          Q           Back in 2010 we are talking, if  
20          you received a copy of the request seeking  
21          surveillance footage, it made its way to your  
22          desk, was it ever your job to determine  
23          whether or not that footage was produced, or  
24          was that a decision made by someone else?

25          A           To produce it, it would be my

1 decision.

2 Q And what factors would you  
3 consider back in 2010 whether or not to  
4 produce footage?

5 A Where the request came from.

6 Q And if you received a request from  
7 an attorney's office pursuant to a case like  
8 this requesting surveillance footage, would  
9 you typically produce that without a subpoena  
10 being required or would you normally require  
11 something more?

12 A I would produce it and give it to  
13 the case management department to determine  
14 whether or not it would be sent to the  
15 attorney.

16 Q Okay. So, we might be using the  
17 word produced too liberally here.

18 What I meant produced, my  
19 question, I was kind of indicating making the  
20 response and giving it to the requesting  
21 party.

22 When you just said produced, you  
23 mean giving that to the case management team?

24 A Yes.

25 Q And if we need to go off the

1 have to be now, of course, I wanted to take a  
2 quick break so I can call Max. Is that okay?

3 MR. WINEBRIGHT: Yeah. I am  
4 actually -- let me do that now. I am just  
5 looking at my notes. I don't think I have  
6 much more. We can go off the record real  
7 quick.

8 MR. CEJAS: Take a five-minute  
9 break.

10 (A break was had off the  
11 record.)

12 MR. KNUDSEN: Everybody okay?

13 MR. CEJAS: You can go ahead.

14 A Yeah. In my testimony, I used the  
15 term case management; it should be risk  
16 management.

17 And also, any request for video or  
18 reports or anything like that don't come  
19 directly to me. They go to case management --  
20 there I go again, they go to risk management  
21 and they, in turn, contact me for that  
22 information. Okay.

23 BY MR. WINEBRIGHT:

24 Q So, in response to those, my  
25 earlier questions where you say case

1 management, you meant to say risk management?

2 A Yes, sir.

3 Q Okay. I actually looked through  
4 my notes. I don't have any additional  
5 questions. I believe Max may have a few for  
6 you.

7 REDIRECT EXAMINATION

8 BY MR. KNUDSEN:

9 Q Yes. Just a couple more here.

10 So, if risk management were to  
11 receive a request for, you know, somebody  
12 being injured on St. Luke's Hospital including  
13 a request for recordings such as the ones  
14 showed, such as the footage shown in  
15 Exhibit 3, it would have been St. Luke's  
16 standard procedure to preserve such a  
17 recording. Right?

18 A Correct.

19 Q And if the police would have asked  
20 for such recording, have you -- has  
21 St. Luke's -- scratch that. Let me start  
22 over.

23 If the police would have asked for  
24 a recording, would you have turned -- would  
25 St. Luke's have turned that over to the

1 police?

2 A Yes.

3 Q And has St. Luke's -- and this is  
4 all in the 2010 time period, so would that  
5 apply, my previous two questions, would that  
6 apply -- would that be the same in 2010?

7 A Correct.

8 Q Specifically November 24th, 2010?

9 A Correct.

10 Q And has St. Luke's during the  
11 entire twenty-four years you have been there  
12 ever denied a police request for video  
13 footage?

14 A Have we denied?

15 Q Yes.

16 A No, we have never denied.

17 Q So, turning to Exhibit 3, those  
18 angles there, is there any way to actually go  
19 back and determine if a different angle ever  
20 existed --

21 A No.

22 Q -- in that specific location?

23 A No.

24 Q So, in your experience at  
25 St. Luke's, have you used those video

1 recordings to identify license plates?

2 A No.

3 Q Have you used those footage to  
4 identify, you know, individuals if say  
5 St. Luke's was investigating a report?

6 A Yes.

7 Q And could you describe what that  
8 process would look like?

9 A Review of the camera, I mean...

10 Q So, you would look at the camera  
11 first?

12 A Correct.

13 Q And then would you speak with  
14 individuals working in that emergency  
15 department after reviewing the camera footage?

16 I guess, if you are going back to  
17 identify individuals when a report is made,  
18 can you just kind of walk me what the  
19 procedure was in place in 2010?

20 A It depends, what we are looking  
21 at.

22 Q But you could have used that  
23 footage to identify individuals. Correct?

24 A Correct.

25 Q And that has been -- that, as of

1 November 24th, 2010, St. Luke's had used  
2 footage from that tunnel to identify --

3 A St. Luke's what?

4 Q St. Luke's would have -- could  
5 have identified individuals using that camera  
6 footage. True?

7 A Not by name, but we could identify  
8 the person.

9 Q And then what could have come next  
10 in the process of attempting to identify that  
11 individual?

12 A We would have went over there to  
13 the ER.

14 Q But there is no way of being able  
15 to do that now with respect any footage taken  
16 on November 24th, 2010. Correct?

17 A Correct.

18 Q And that's because such footage no  
19 longer exists?

20 A Correct.

21 Q So, that -- the image I believe on  
22 page two, showing kind of the exit right  
23 there, or -- no, you are looking at it. That  
24 page.

25 A Here?

1 Q Yes.

2 A Okay.

3 Q So, that was capable of  
4 identifying vehicles coming in and leaving  
5 through that --

6 A Correct.

7 Q -- tunnel entrance. Correct?

8 A Correct.

9 Q So, even though the angle does not  
10 show vehicles parked there, it would be  
11 capable of identifying vehicles backing out of  
12 those spots. Correct?

13 A Correct.

14 Q Okay. So, with respect to the  
15 document request that you could not locate any  
16 documents pursuant to your searches, would  
17 those -- as of November 24th, 2010, would  
18 those documents have been kept in the ordinary  
19 course of St. Luke's business?

20 A Which documents?

21 Q Those requested of you in Exhibit  
22 A, to which you stated earlier that you could  
23 not produce?

24 A These?

25 Q No. So, that's an example of a